



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

---

*86 Chambers Street  
New York, New York 10007*

August 23, 2021

**BY ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2203  
New York, NY 10007

Re: *Knight First Amendment Institute v. U.S. Dep't of Homeland Security et al.*,  
No. 17 Civ. 7572 (ALC)

Dear Judge Carter:

I write respectfully on behalf of United States Immigration and Customs Enforcement ("ICE") in the above-referenced FOIA action to provide a status update regarding supplemental searches to be conducted by ICE, *see* Dkt. No. 183, and to respectfully request that the parties provide a joint status update to the Court by August 25, 2021. As the parties previously explained, *see, e.g.*, Dkt. No. 178, the parties have been working diligently to attempt to refine the supplemental searches in order to narrow the universe of potentially responsive documents. The parties agreed to a revised set of search strings, and since the parties' last update to the Court, ICE has conducted that search, and determined that the search returned approximately 3,000 documents (not pages) of potentially responsive documents. The parties are now conferring regarding a possible processing schedule. ICE respectfully requests that the parties provide a joint status update to the Court by August 25, 2021; plaintiff consents to that request.

I thank the Court for considering this matter.

Respectfully,

AUDREY STRAUSS  
United States Attorney

By: /s/ Ellen Blain  
ELLEN BLAIN  
Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, NY 10007  
Tel: (212) 637-2743  
Email: ellen.blain@usdoj.gov

cc: Counsel for Plaintiff (by ECF)